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February 24, 2022

**BY ELECTRONIC FILING**

Hon. Denise L. Cote, U.S. District Judge  
U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Greater New York Benefit and Education Funds v. Manhattanview Healthcare Center, Case No.: 20-cv-6936

Greater New York Benefit and Education Funds v. Amboy Care Center, Inc. Healthcare Center, Case No.: 20-cv-6932

Dear Judge Cote:

We represent Plaintiffs in these actions by multiemployer employee benefit funds to collect contributions due from Defendants. This is a joint request by all parties for a 30-day extension of the March 18, 2022 due date for submission of Plaintiffs' summary judgment motions.

This morning, the parties had a very productive session with mediator Holly Weiss. The parties agree there is framework for settlement of these actions. However, final settlement appears to hinge upon resolution of other issues between Defendants and 199SEIU United Healthcare Workers East ("Union"), under whose collective bargaining agreement Defendants' contribution obligation arises. Discussions between Defendants and the Union are at an advanced stage but Defendants doubt that a global resolution is possible before March 18, 2022.

In the interests of avoiding additional attorney's fees and as well as judicial economy, the parties respectfully request the Court to extend the filing deadline for submission of Plaintiffs' summary judgment motion 30 days. I note that I will be on vacation from March 25<sup>th</sup> through April 1, 2022.

1289-003-00001: 11327909 (002)

*Advancing the rights of  
everyone who works*

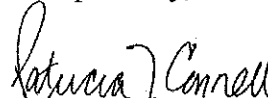
\* Admitted in NY and NJ.    ♦ Admitted in NY and CA.    ♦ Admitted in NY and MI.

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Counsel appreciate the Court's consideration.

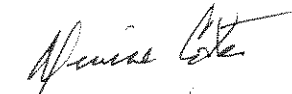
Respectfully,

  
Patricia McConnell

PMC:jw

cc: David Jasinski, Esq.  
Erin Henderson, Esq.

*Granted. Any motion is due  
April 15; opposition is due  
May 6; reply is due May  
20. Any motion shall  
be fully submitted by May  
20, 2022. There shall  
be no further adjournment  
of that date.*

  
2/25/22